

227228

STATE OF SOUTH CAROLINA

## (Caption of Case)

Application of May River Water Company, Inc.  
for Adjustment of Rates and Charges and  
Modifications to Certain Terms and Conditions  
for the Provision of Water Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2010 - 132 - W

(Please type or print)

Submitted by: Benjamin P. Mustian, Esquire

SC Bar Number: 68269

Address: Post Office Box 8416

Telephone: 803-252-3300

Columbia, SC 29202

Fax: 803-771-2410

Other:

Email: bmustian@willoughbyhoefer.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input checked="" type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input checked="" type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

**WILLOUGHBY & HOEFER, P.A.**

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY  
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RANDOLPH R. LOWELL  
ELIZABETH ZECK\*  
BENJAMIN P. MUSTIAN  
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ANDREW J. MACLEOD  
CHAD N. JOHNSTON

AREA CODE 803  
TELEPHONE 252-3300  
TELECOPIER 256-8062

TRACEY C. GREEN  
ALAN WILSON  
SPECIAL COUNSEL

December 8, 2010

\*ALSO ADMITTED IN TX

**VIA HAND DELIVERY**

The Honorable Jocelyn D. Boyd  
Chief Clerk/Administrator

**Public Service Commission of South Carolina**

101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Application of May River Water Company, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water service. Docket No.: 2010-132-W

Dear Ms. Boyd:

Enclosed for filing in the above-captioned matter please find the original Affidavits of Dennis C. Morris, Lindsay Martin and Anthony Abbott, copies of which were attached to the Pre-Filed Direct Testimony of Thomas A. Smith, III filed on November 18, 2010.

By copy of this letter, I am serving all parties of record in this proceeding with a copy of same and enclose a certificate of service to that effect.

If you have any questions, or if I may be of any further assistance, please do not hesitate to contact me.

Sincerely,

**WILLOUGHBY & HOEFER, P.A.**



Benjamin P. Mustian

BPM/ct  
Enclosures

cc: Jeffrey M. Nelson, Esquire  
Margaret M. Fox, Esquire

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2010-132-W**

IN RE:

Application of May River Water  
Company, Inc. for adjustment of  
rates and charges for the provision  
of water service.

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**AFFIDAVIT OF LINDSAY MARTIN**

Personally appeared before me, Lindsay Martin who after being duly sworn, deposes and states as follows:

1. I am a citizen and resident of the State of Georgia, am in excess of eighteen years of age and am competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am the Owner and Operator of MSO Water Systems, Inc. ("MSO"), which provides operation, installation, management and maintenance services for water systems owned by private water companies.

3. On November 17, 2010, I issued, on behalf of MSO, a proposal to May River Water Company, Inc. for the management of its water system located in Bluffton, South Carolina ("Proposal"). A copy of the Proposal is attached hereto and incorporated herein as Exhibit "A."

4. As indicated in the Proposal, MSO would charge \$2,125.00 per month for the management of the May River Plantation subdivision water system.

  
Lindsay Martin

SWORN TO AND SUBSCRIBED BEFORE ME  
This 18<sup>th</sup> day of Nov, 2010

Lebel Nichols  
Notary Public for Georgia  
My Commission Expires: \_\_\_\_\_

Application of May River Water Company, Inc. for adjustment of rates and charges for the provision of water service.

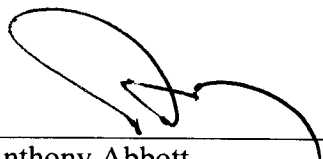
Personally appeared before me, Anthony H. Abbott who after being duly sworn, deposes  
and states as follows:

1. I am a citizen and resident of the State of Georgia, am in excess of eighteen years of age and am competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

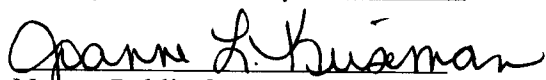
2. I am the President of Consolidated Utilities, Inc. (“Consolidated”), which provides operation, installation, management and maintenance services for water systems owned by private water companies, and owns and operates community water systems.

3. On November 9, 2010, I issued, on behalf of Consolidated, a proposal to May River Water Company, Inc. for the management of its water system located in Bluffton, South Carolina ("Proposal"). A copy of the Proposal is attached hereto and incorporated herein as Exhibit "A."

4. As indicated in the Proposal, Consolidated would charge \$3,000.00 per month for the management of the May River Plantation subdivision water system.

  
\_\_\_\_\_  
Anthony Abbott

SWORN TO AND SUBSCRIBED BEFORE ME  
This 18th day of November, 2010



Notary Public for Georgia

My Commission Expires: \_\_\_\_\_



**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2010-132-W**

IN RE:

Application of May River Water  
Company, Inc. for adjustment of  
rates and charges for the provision  
of water service.

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**AFFIDAVIT OF DENNIS C. MORRIS**

Personally appeared before me, Dennis C. Morris who after being duly sworn, deposes and states as follows:

1. I am a citizen and resident of the State of Georgia, am in excess of eighteen years of age and am competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
2. I am the President of Lakeside Water Company, Inc. ("Lakeside"), which provides operation, installation, management and maintenance services for water systems owned by private water companies and owns and operates community water systems.
3. On January 14, 2008, I issued, on behalf of Lakeside, a proposal to May River Water Company, Inc. for the management of its water system located in Bluffton, South Carolina ("Proposal"). A copy of the Proposal is attached hereto and incorporated herein as Exhibit "A."
4. As indicated in the Proposal, Lakeside would charge \$2,250.00 per month for the management of the May River Plantation subdivision water system.

Dennis C. Morris  
Dennis C. Morris

SWORN TO AND SUBSCRIBED BEFORE ME

This 17<sup>th</sup> day of Nov., 2010

Sherri L. Kidwell

Notary Public for Georgia

My Commission Expires: 9/22/13

**SHERRI L. KIDWELL**  
Notary Public, Effingham County  
State of Georgia  
My Commission Expires September 22, 2013

RECEIVED  
NOTARY PUBLIC  
EFFINGHAM COUNTY  
GEORGIA  
SEP 22 2013



**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2010-132-W**

IN RE:

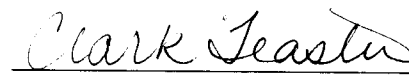
Application of May River Water  
Company, Inc. for adjustment of  
rates and charges and modifications  
to certain terms and conditions for  
the provision of water service.

**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day one (1) copy of the **Affidavits of Dennis C. Morris, Lindsay Martin and Anthony Abbott** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Jeffrey M. Nelson, Esquire  
**Office of Regulatory Staff**  
Post Office Box 11263  
Columbia, South Carolina 29211

Margaret M. Fox, Esquire  
**McNair Law Firm, P.A.**  
Post Office Box 11390  
Columbia, SC 29211

  
Clark Teaster

Columbia, South Carolina  
This 8<sup>th</sup> day of December, 2010.